

Nancy E. Hudgins, SBN 85222
 Matthew M. Grigg, SBN 195951
 LAW OFFICES OF NANCY E. HUDGINS
 1981 N. Broadway, Ste. 210
 Walnut Creek, CA 94596
 925-906-0100
 mmg@hudginslaw.com

Attorneys for Defendants Joe Dobie, Philip Earley,
 Gary Loredo and Brad Smith

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

10	MARKEE CARTER,) Case No.: 13-cv-04373-EMC
11	Plaintiff,)
12	v.) DEFENDANT'S ADMINISTRATIVE
13	BRAD SMITH, et al.,) MOTION TO FILE UNDER SEAL
14	Defendants.) <u>Accompanying Papers:</u>
15	AND RELATED ACTIONS:) 1. Declaration of Counsel
16	• <i>Spells v. Smith, et al.</i> , No. 13-4102-EMC)
17	• <i>Hirscher v. Smith, et al.</i> , No 14-0340-EMC)
18	• <i>Beyett v. Smith, et al.</i> , No. 14-3153-EMC)
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Defendants Dobie, Earley, Loredo, and Smith pursuant to Northern District Local Rule 7-11 and 79-5, respectfully request permission to file under seal Paragraph 2 of the order portion of the stipulation attached to the accompanying Grigg Declaration as Exh. A. Good cause exists to permit filing of said paragraph under seal because:

1. it reflects confidential settlement terms,
2. sealing promotes settlements in general by allowing parties to enter into confidential settlements,
3. the transcript of the settlement proceedings reflecting these settlement terms previously was placed under seal by Magistrate Judge Spero (*see* Doc. 68-8), and

1 4. sealing this paragraph is necessary to file the stipulation and proposed order which,
2 in turn, appears necessary to finalize the settlement of the four lawsuits at issue.
3 Grigg Decl., ¶2.

4 Respectfully submitted:

5 Dated: March 18, 2016

6 LAW OFFICES OF NANCY E. HUDGINS

7 /s/ Matthew M. Grigg

8 Matthew M. Grigg

9 Attorney for Defendants Joe Dobie, Philip Earley,
10 Gary Loreda, and Brad Smith
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